

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI

DAVID DIXON, et al.,	)	
	)	
Plaintiffs,	)	
	)	
V.	)	Case 4:19-cv-00112-AGF
	)	
CITY OF ST. LOUIS, et al.,	)	
	)	
Defendants.	)	

**MOTION FOR SUMMARY JUDGMENT**

Plaintiffs David Dixon, Jeffrey Rozelle, Aaron Thurman, and Richard Robards, on behalf of themselves and all others similarly situated, respectfully move for summary judgment on their claims for declaratory relief against Defendants Judge Robin Ransom, Judge Rex Burlison, Judge Elizabeth Hogan, and Judge David Roither, in their official capacities; and on their claims for injunctive and declaratory relief against Defendant the City of St. Louis, and Defendants Sheriff Vernon Betts and Commissioner Dale Glass in their official capacities. In support of this motion, Plaintiffs refer this Court to their accompanying memorandum of law, statement of uncontroverted material facts, and exhibits.

Dated: March 10, 2021

Respectfully submitted,

INSTITUTE FOR CONSTITUTIONAL  
ADVOCACY AND PROTECTION

/s/ Seth Wayne

Seth Wayne (D.C. Bar No. 888273445,  
Federal Bar No. 888273445)  
Robert D. Friedman (D.C. Bar No. 1046738,  
Federal Bar No. 5240296NY) (admitted pro  
hac vice)  
Mary B. McCord (MBE #41025MO,  
Federal Bar No. 427563DC) (admitted pro  
hac vice)

Georgetown University Law Center  
600 New Jersey Ave. NW  
Washington, D.C. 20001  
Tel: 202-662-9042  
sw1098@georgetown.edu  
rdf34@georgetown.edu  
mbm7@georgetown.edu

ARCHCITY DEFENDERS, INC.

/s/ Maureen Hanlon

Blake A. Strode (MBE #68422MO)  
Michael-John Voss (MBE #61742MO)  
Jacki Langum (MBE #58881MO)  
John M. Waldron (MBE #70401MO)  
Maureen Hanlon (MBE #70990MO)  
Emanuel Powell (MA Bar No. #706171MA)  
440 N. 4th Street, Suite 390  
Saint Louis, MO 63102  
855-724-2489  
314-925-1307 (fax)  
bstrode@archcitydefenders.org  
mjvoss@archcitydefenders.org  
jlangum@archcitydefenders.org  
jwaldron@archcitydefenders.org  
mhanlon@archcitydefenders.org  
epowell@archcitydefenders.org

ADVANCEMENT PROJECT

/s/ Thomas B. Harvey

Thomas B. Harvey (MBE #61734MO)  
Miriam R. Nemeth (D.C. Bar No. 1028529)  
(admitted pro hac vice)  
1220 L Street, N.W., Suite 850  
Washington, DC 20005  
Tel: (202) 728-9557  
Fax: (202) 728-9558  
tharvey@advancementproject.org  
mnemeth@advancementproject.org

CIVIL RIGHTS CORPS

/s/ Alec Karakatsanis

Alec Karakatsanis (D.C. Bar No. 999294)  
910 17th Street NW, Suite 200  
Washington, DC 20006  
Tel: 202-599-0953

Fax: 202-609-8030  
alec@civilrightscorps.org  
*Attorneys for Plaintiffs*